

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

MISSISSIPPI STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE;
DR. ANDREA WESLEY; DR. JOSEPH
WESLEY; ROBERT EVANS; GARY
FREDERICKS; PAMELA HAMNER
BARBARA FINN; OTHO BARNES;
SHIRLINDA ROBERTSON; SANDRA
SMITH; DEBORAH HULITT; RODESTA
TUMBLIN; DR. KIA JONES; ANGELA
GRAYSON; MARCELEAN ARRINGTON;
VICTORIA ROBERTSON

PLAINTIFFS

VS.

CIVIL ACTION NO. 3:22-cv-734-DPJ-HSO-LHS

STATE BOARD OF ELECTION
COMMISSIONERS; TATE REEVES, *in his*
official capacity as Governor of Mississippi;
LYNN FITCH, *in her official capacity as*
Attorney General of Mississippi; MICHAEL
WATSON, *in his official capacity as Secretary*
of State of Mississippi

DEFENDANTS

and

MISSISSIPPI STATE REPUBLICAN
EXECUTIVE COMMITTEE

DEFENDANT-INTERVENOR

STIPULATION AS TO INCUMBENT ADDRESS LIST

COME NOW THE PARTIES, Plaintiffs, Mississippi Conference of the National Association for the Advancement of Colored People, Dr. Andrea Wesley, Dr. Joseph Wesley, Robert Evans, Gary Fredericks, Pamela Hamner, Barbara Finn, Otho Barnes, Shirlinda Robertson, Sandra Smith, Deborah Hulitt, Rodesta Tumblin, Dr. Kia Jones, Angela Grayson, Marcelean Arrington, and Victoria Robertson (the "Plaintiffs"), State Board of Election Commissioners, Tate Reeves, *in his official capacity as Governor of Mississippi*, Lynn Fitch, *in her official capacity as Attorney General of Mississippi*, and Michael Watson, *in his official capacity as Secretary of State*

of Mississippi (the “Defendants”), Mississippi State Republican Executive Committee (“Defendant-Intervenor”), AND NON-PARTY the Standing Joint Legislative Committee on Reapportionment and Redistricting (the “Standing Joint Committee”) and stipulate and agree regarding the production of certain documents as follows:

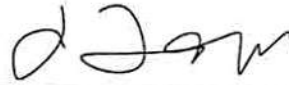
1. The parties stipulate and agree that the production of documents Bates-numbered SDT-SJLCRR-002125 – SDT-SJLCRR-002134, which documents contain information regarding residential addresses of incumbent Mississippi legislators gathered by the Standing Joint Committee staff in connection with legislative redistricting in 2021 and 2022, does not constitute or effectuate a waiver of the legislative privilege, attorney-client privilege or any other applicable privileges. The parties agree that neither they nor their respective counsel will contend otherwise in this action or any other action.

2. The parties further stipulate and agree that by producing the above-mentioned documents subject to this stipulation, Defendants, Defendant-Intervenor, the subpoenaed Legislators and their staff, and the Standing Joint Committee and its staff do not concede that any witness may be questioned at deposition or trial regarding this produced document or any other matter, and reserve the right to assert that any witness is shielded from testifying on the grounds of legislative privilege, attorney client privilege or any other applicable privileges.

3. The parties further stipulate and agree that by accepting production of the above-mentioned documents subject to this stipulation Plaintiffs do not concede that any witness may not be questioned at deposition or trial, and reserve the right to assert that any witness is not shielded from testifying on the grounds of legislative privilege, attorney client privilege or any other applicable privileges.

4. The parties further stipulate and agree that any party may use the above-mentioned documents as authenticated evidence at trial and that no objection will be made to their admissibility.

This the 15 day of August, 2023.



Joshua F. Tom (MSB No. 105392)

ACLU OF MISSISSIPPI

Robert B. McDuff (MSB No. 2532)

MISSISSIPPI CENTER FOR JUSTICE

Carroll Rhodes (MSB No. 5314)

LAW OFFICES OF CARROLL RHODES

Ari J. Sivitzky, pro hac vice

Kelsey Miller, pro hac vice

Ming Cheung, pro hac vice

Patricia Yan, pro hac vice

ACLU FOUNDATION

John P. Lavelle, Jr., pro hac vice

Drew C. Jordan, pro hac vice

MORGAN, LEWIS & BOCKIUS

Ezra D. Rosenberg, pro hac vice

Jennifer Nwachukwu, pro hac vice

David Rollins-Boyd, pro hac vice

LAWYERS COMMITTEE FOR CIVIL

RIGHTS UNDER LAW

Counsel for Plaintiffs

This the 15th day of August, 2023.



Rex M. Shannon III (MB #102974)
STATE OF MISSISSIPPI
OFFICE OF THE ATTORNEY GENERAL
CIVIL LITIGATION DIVISION

Tommie S. Cardin (MB #5863)
P. Ryan Beckett (MB #99524)
B. Parker Berry (MB #104251)
BUTLER SNOW LLP

Counsel for Defendants

This the ____ day of August, 2023.

Michael B. Wallace (MB #6904)
Charles E. Cowan (MB #104478)
WISE CARTER CHILD & CARAWAY, P.A.

Counsel for Defendant-Intervenor
Mississippi State Republican Executive Committee


This the ____ day of August, 2023.

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Counsel for Defendants

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WISE CARTER CHILD & CARAWAY, P.A.

Counsel for Defendant-Intervenor
Mississippi State Republican Executive Committee

This the 15th day of August, 2023.

A handwritten signature in blue ink, appearing to be "P. Ryan Beckett", written over a horizontal line.

Tommie S. Cardin (MB #5863)

P. Ryan Beckett (MB #99524)

B. Parker Berry (MB #104251)

BUTLER SNOW LLP

*Counsel for the Standing Joint Legislative
Committee on Reapportionment and Redistricting*